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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CASE NO. 21-31954-HDH-11
	§	
2999TC ACQUISITIONS, LLC,	§	CHAPTER 11
	§	
DEBTOR.	§	
	§	

**HNGH TURTLE CREEK, LLC'S MOTION FOR LEAVE TO FILE DOCUMENTS
UNDER SEAL**

HNGH Turtle Creek, LLC ("HN") files this *Motion for Leave to File Documents Under Seal* (the "**Motion**") and would respectfully show the Court the following:

FACTS

1. On November 4, 2021, HN filed its *Motion to Dismiss Debtor's Bankruptcy Case or, In the Alternative, for Relief from the Automatic Stay, with Incorporated Brief in Support*, (the "**Motion**") at Docket Nos. 9 and 10.

2. In support of their Motion, HN On December 6, 2021, HN filed its *Witness and Exhibit List for Hearing on December 9, 2021* (the "**Witness and Exhibit List**") with its Exhibits 1 through 66. HN has referenced Exhibits 17, 18, 19, 21, 22, 23, 39, 40, 41, and 42 as confidential and would like them to be filed under seal (the "**Sealed Exhibits**").

3. The Sealed Exhibits contain information HN asserts should be kept confidential, and that confidentiality of the Sealed Exhibits is in the best interests of the Debtor's estates. It is HN's understanding that the Debtor does not oppose that the Sealed Exhibits remain confidential.

RELIEF REQUESTED

4. Pursuant to the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, this Court may permit parties to file exhibits under seal even if no statute or rule requires the exhibit to be filed under seal. *See* LBT 9077-1(b). HN requests that the Court grant its request for relief in order to preserve the confidentiality of the Sealed Exhibits for the benefit of the Debtor's estate.

5. Concurrently with the filing of this Motion, HN will file Exhibits 17, 18, 19, 21, 22, 23, 39, 40, 41, and 42 electronically with Court pursuant to the Local Rules for the Northern District of Texas and the ECF event for sealed documents.

6. To the best of HN's knowledge, the Debtor does not oppose the requested relief.

WHEREFORE, HN prays that this Court grant this Motion and allow the Sealed Exhibits to be filed under seal and grant such other and further relief to which it may be justly entitled.

DATED: December 8, 2021

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ John J. Kane

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CERTIFICATE OF CONFERENCE

On December 8, 2021, I communicated with counsel for the Debtor regarding the requested relief and the Debtor does not oppose the Motion

/s/ John J. Kane
John J. Kane

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 8, 2021, a true and correct copy of the foregoing document was filed with the Court and served (i) via the Court's electronic case filing system (ECF) upon all parties receiving such electronic service in this proceeding, and (ii) via e-mail on the parties listed below.

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/s/ John J. Kane
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